

October 25, 2021

Distributed Generation Board
1 Capitol Hill
Providence, RI 02908

Re: NECEC Comments to DG Board - Carport Solar Adder

Dear Distributed Generation Board Members,

The Northeast Clean Energy Council (“NECEC”) appreciates the opportunity to submit comments in support of the continuation of the Carport Solar Adder within the Renewable Energy Growth Program (“RE Growth”). As Rhode Island seeks to maximize the development of renewable resources, with a particular emphasis on the built environment, the Carport Adder is a valuable tool that has led to projects sited in beneficial areas. It should be continued at a level at which the benefits outweigh the costs.

NECEC is a clean energy business, policy, and innovation organization whose mission is to create a world-class clean energy hub in the Northeast, delivering global impact with economic, energy and environmental solutions. NECEC is the only organization in the Northeast that covers all of the clean energy market segments, representing the business perspectives of investors and clean energy companies across every stage of development. NECEC members span the broad spectrum of the clean energy industry, including clean transportation, energy efficiency, wind, solar, energy storage, microgrids, fuel cells, and advanced and “smart” technologies.

In its Benefit-Cost analysis, Sustainable Energy Advantage (“SEA”) identified multiple benefits of the Carport Solar Adder including the opportunity to promote beneficial siting and alleviate land use challenges. In addition, unquantified benefits include avoided costs of snow clearing, and job-related benefits.

Any application of the Carport Adder that carries a Benefit-Cost Ratio greater than 1.0 should warrant a continuation for another year. As shown in the SEA analysis, there are several cases where the benefits outweigh the costs, including for high-benefits, low cost commercial projects at a 7.5 cent adder level. Additionally, it is likely that the Carport Adder would be cost-effective across all or most cases if the adder level were to be reduced. We urge the DG Board to recommend that National Grid propose a Carport Adder at a value by which the benefits are greater than the costs, even if it requires reducing the adder from historical levels. Such approval will allow continued market development of this segment or the solar industry.

Thank you for your consideration of these comments. Continuing the Carport Adder, even at a reduced value, will allow developers the opportunity to respond to the adder to develop these beneficially sited projects and, as such, we recommend continuing the Carport Adder.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Sean Burke". The signature is written in a cursive, slightly slanted style.

Sean Burke
Policy Manager